

1 **JOE HILL**

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2 Susupe Village

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5 Fax: (670) 234-7753

6 Attorney for Plaintiffs,

7  
8 **IN THE UNITED STATES DISTRICT COURT**  
9 **FOR THE NORTHERN MARIANA ISLANDS**

10 **ABELLANOSA, JOANNA, et**  
11 **al.,**

12 **Plaintiffs,**

13 **v.**

14 **L&T INTERNATIONAL**  
15 **CORPORATION,**

16 **Defendant.**

**Civil Action No. 05-0010**

**DECLARATION OF JOE**  
**HILL IN SUPPORT OF**  
**MOTION TO COMPEL**  
**ANSWERS TO REQUESTS**  
**FOR ADMISSION AND**  
**ANSWERS TO**  
**INTERROGATORIES/LR**  
**26.4 CERTIFICATE OF**  
**COMPLIANCE**

17  
18 I, JOE HILL, hereby declare as follows:

19 1. I am over the age of eighteen years, have personal knowledge of the  
20 facts set forth herein, am competent to testify as to these facts if called as a  
21 witness in a court of law, and if called would testify as stated herein.

22 2. I am the attorney for plaintiffs in the above-entitled case.  
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JOE HILL  
Attorney at Law  
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1           3.     On April 25, 2006, Counsel for Plaintiffs propounded and served on  
2 Defendant, Plaintiffs' First Set of Request for Admissions and First Set of  
3 Interrogatories to Defendant L&T International Corporation, attached as  
4 **Exhibit "A"** to the motion.

5           4.     On June 12, 2006, Defendant L&T International Corporation served  
6 on Plaintiffs its Response To Plaintiff's First Set of Request for Admissions and  
7 Response to Plaintiffs' First Set of Request for Interrogatories, *attached as* **Exhibit**  
8 **"B"** and **"C"** to the motion.

9           5.     Counsel for Plaintiffs, having reviewed Defendant's Response,  
10 found that certain of the Interrogatories and Request were either not answered  
11 completely and fully, were evasive or not responsive to the questions asked or  
12 objected to and not answered sufficiently for assertedly being vague, overbroad,  
13 unduly burdensome or not likely to lead to relevant evidence.

14           6.     To comply with the meet and confer duty expressed in Local Rule  
15 26.4, on July 28, 2006, counsel for Plaintiffs sent via facsimile and thereafter on  
16 July 31, 2006 served the original copy by hand-delivery on counsel for Defendant,  
17 Colin Thompson's office, a detailed letter addressing the requested discovery. A  
18 copy of said letter is attached as **Exhibit "D"** to the motion.

19           7.     Attorney Thompson is off-island and no specific response to the  
20 said meet and confer letter has been received by Plaintiffs. To preserve Plaintiffs'  
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1 rights under the Case Management Scheduling Order, Plaintiffs believe it is  
2 necessary to file their motion to compel on August 3, 2006.

3 Under the circumstances, counsel, Joe Hill believes that he has reasonably  
4 attempted and/or complied with LR 26.4 prior to making the motion to compel.

5 I declare under penalty of perjury that the foregoing is true and correct and  
6 that this declaration was executed on August 3, 2006, at Susupe Village, Island of  
7 Saipan, Commonwealth of the Northern Mariana Islands.  
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9  
10 /s/ \_\_\_\_\_  
11 **JOE HILL**  
12 Declarant  
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